IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259 (DCG-JES-JVB) (consolidated cases)

UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES IN ITS REPLY IN SUPPORT OF ITS RENEWED MOTION TO COMPEL PRODUCTION OF BRYAN AND WIENCKOWSKI DOCUMENTS

The United States respectfully requests leave to exceed the page limitation on discovery motions in its reply in support of its renewed motion to compel production of Thomas Bryan and Eric Wienckowski's ("Respondents") documents. *See* ECF No. 634. Respondents do not oppose this request.

Western District of Texas Local Rule CV-7(E)(3) limits replies to discovery motions to five pages. The United States seeks leave to exceed this limitation and file a reply that is no more than seven pages long. The excess pages will allow the United States to respond in full to Respondents' response to the renewed motion, which response exceeded Rule CV-7(D)(3)'s limitation by 10 pages with the United States' consent and this Court's authorization. *See* ECF No. 640. Respondents do not oppose this motion to file excess pages and will not be prejudiced by the relief requested. A proposed order, along with the proposed reply and accompanying exhibit, is attached hereto.

Dated: November 23, 2022

ELISE C. BODDIE Principal Deputy Assistant Attorney General Civil Rights Division

/s/ Jaywin Singh Malhi

T. CHRISTIAN HERREN, JR. TIMOTHY F. MELLETT DANIEL J. FREEMAN JANIE ALLISON (JAYE) SITTON MICHELLE RUPP JACKI L. ANDERSON JASMIN LOTT HOLLY F.B. BERLIN JAYWIN SINGH MALHI L. BRADY BENDER Attorneys, Voting Section Civil Rights Division U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, D.C. 20530 (800) 253-3931 jaywin.malhi@usdoj.gov

CERTIFICATE OF CONFERRAL

I hereby certify that, on November 22, 2022, the United States met and conferred with Respondents concerning the subject of this motion. Respondents do not oppose the relief sought.

/s/ Jaywin Singh Malhi
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CERTIFICATE OF SERVICE

I hereby certify that, on November 23, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Jaywin Singh Malhi
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